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PACIFIC BELL TELEPHONE COMPANY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

CALIFORNIA SPORTFISHING
PROTECTION ALLIANCE,

Plaintiff,

v.

PACIFIC BELL TELEPHONE
COMPANY,

Defendant.

CASE NO. 2:21-CV-00073-JDP

**STIPULATION RE PROTECTIVE
ORDER; [PROPOSED]
PROTECTIVE ORDER**

Magistrate Judge: Hon. Jeremy D.
Peterson

Complaint Filed: January 14, 2021

1 Having met and conferred, Plaintiff California Sportfishing Protection Alliance
2 (“CSPA”) and Defendant Pacific Bell Telephone Company (“Pacific Bell”) (together, the
3 “Parties” and each a “Party”) stipulate as follows:

4 WHEREAS, the Parties agree that the documents and other materials produced
5 through discovery may be subject to confidentiality limitations or disclosure due to federal
6 laws, state laws, and/or privacy rights, including, but not limited to, information involving
7 trade secrets, confidential business, financial or personal information and information
8 protected by California’s constitutional and common law right to privacy, or under other
9 provisions of California law or other applicable law;

10 WHEREAS, the Parties agree that to facilitate the exchange of information and
11 documents, certain provisions should govern the use and maintenance of information that
12 is subject to confidentiality limitations or disclosure under applicable law; and

13 NOW, THEREFORE, the parties respectfully and jointly ask that the Court enter an
14 order governing the use and maintenance of confidential information exchanged between
15 the Parties during discovery. A stipulated proposed protective order follows the Parties’
16 signature blocks.

17 DATED: January 11, 2024

Respectfully submitted,

KIRKLAND & ELLIS LLP

19
20 /s/ Hariklia Karis

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21
22 The filer of this document attests that all signatories listed above have concurred in
23 the filing of this documents.
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